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15 *Attorneys for Defendants Richland*

16 *Holdings, Inc. d/b/a AcctCorp of Southern*

17 *Nevada and Parker & Edwards, Inc.*

18 **UNITED STATES DISTRICT COURT**

19 **DISTRICT OF NEVADA**

20 LINDA COX,

21 Plaintiff,

22 vs.

23 RICHLAND HOLDINGS, INC. d/b/a
24 ACCOUNT CORP OF SOUTHERN
25 NEVADA, a Nevada Corporation; PARKER
26 & EDWARDS, INC., a Nevada Corporation;
27 and THE LANGSDALE LAW FIRM, P.C., a
Nevada professional corporation,

Defendants.

Case Number: 2:16-cv-02914-APG-VCF

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE**

(FIRST REQUEST)

Plaintiff Linda Cox ("Plaintiff") and Defendants Richland Holdings, Inc. d/b/a AcctCorp of Southern Nevada ("AcctCorp"), Parker & Edwards, Inc., and The Langsdale Law Firm, P.C. (together, the "Parties"), by and through their respective counsel of record, hereby stipulate and jointly move the Court, pursuant to LR 26-4, for an Order Extending the Dispositive Motion Deadline an additional thirty (30) days. The current deadline of December 7, 2017 for dispositive motions would be extended to **January 5, 2018**.

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1 1. The deposition of Harry Jacobs, Principal of Safeguard Credit, LLC d/b/a
2 Credit Restoration of Nevada, is scheduled for December 7, 2017, to be conducted at the
3 Federal Courthouse. *See* ECF No. 61.

4 2. On November 15, 2017, this Court entered an Order on the Parties'
5 stipulation for Experian Information Solutions, Inc. to produce documents in response to
6 AcctCorp's subpoena, production of which AcctCorp is currently awaiting. *See* ECF No. 64.

7 3. Accordingly, because these two outstanding issues may affect the content of
8 dispositive motions, the Parties submit that good cause exists to extend the dispositive
9 motion deadline from December 7, 2017, to **January 5, 2018**.

10 **IT IS SO STIPULATED.**

11 Dated this 20th day of November, 2017.

12 LAW OFFICE OF VERNON NELSON

13 /s/ Margaret G. Foley

14 VERNON A. NELSON, JR., ESQ.

15 Nevada Bar No. 6434

16 MARGARET G. FOLEY, ESQ.

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18 JOHN P. SKALAK, ESQ.

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25 Las Vegas, Nevada 89123

26 Attorneys for Plaintiff Linda Cox

 Dated this 20th day of November, 2017.

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/s/ Jared M. Moser

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 Attorneys for Defendants Richland Holdings,
 Inc. and Parker & Edwards, Inc.

 Dated this 20th day of November, 2017.

 ROPER, MAJESKI, KOHN & BENTLEY

/s/ Timothy J. Lepore

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1 *Cox vs. Richland Holdings, Inc. et al.*, Case No. 2:16-cv-02914-APG-VCF
2 Stipulation and Order to Extend Dispositive Motion Deadline (First Request)

3 **IT IS SO ORDERED:**

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5 **DATED:** November 20, 2017.

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CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE